



## U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

January 27, 2021

VIA ECF

Hon. Paul G. Gardephe  
United States District Judge  
United States District Court  
40 Foley Square  
New York, New York 10007

**Re: *Bah v. Wolf, et al.*, No. 20 Civ. 8453 (PGG)**

Dear Judge Gardephe:

This Office represents the government in this action in which the plaintiff seeks *de novo* review of her naturalization application following its denial by U.S. Citizenship and Immigration Services (“USCIS”). The Court has scheduled an initial conference in this matter for February 11, 2021. *See* ECF No. 14. On behalf of the government, I write respectfully to request an on-consent extension of time of sixty days, *nunc pro tunc*, to respond to the complaint in the above-referenced matter (*i.e.*, from January 7, 2021 to March 8, 2021), and a commensurate adjournment of the initial conference. I apologize for the delay in making this application after the original due date of January 7, 2021, which was due to the undersigned’s mis-calendaring of the due date. Plaintiff’s counsel consents to this request.

The additional time is requested because, at USCIS’s request, plaintiff’s counsel has provided additional information in regards to the naturalization application, which USCIS is currently considering. The additional time will thus assist the parties in determining whether the matter can be resolved without further involvement of the Court.

This is the government’s first request for an extension of the deadline to respond to the complaint and, as noted, is *nunc pro tunc*, due to the undersigned’s error regarding the due date. If the Court grants this request, the parties respectfully request that the February 11 initial conference be adjourned to a date at least one week after the requested extended date, *i.e.*, on or after March 15, 2021.

I thank the Court for its consideration of this letter.

## MEMO ENDORSED

The application is granted. The conference scheduled for February 11, 2021 is adjourned to April 8, 2021 at 9:30 a.m.

Respectfully submitted,

AUDREY STRAUSS  
United States Attorney

SO ORDERED.

Paul G. Gardephe  
United States District Judge

January 29, 2021

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